

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

BARBARA LODER HILDEBRANDT,

Plaintiff,

**VS.**

**HYATT CORPORATION, et al.**

**Defendants.**

**Case No. C-1-02-0003**

**Judge Beckwith  
Magistrate Judge Sherman**

**AFFIDAVIT OF DOUGLAS PATRICK**

STATE OF ILLINOIS                 }  
COUNTY OF LAKE                  } ss:

BEFORE ME, the undersigned authority, personally appeared, DOUGLAS PATRICK, who, after first being duly sworn, deposes and states that he is an adult person, over 18 years of age, competent to testify as to the following matters as to which he has personal knowledge or which he believes to be true:

1. I have been employed with Hyatt since 1986. I am currently the Assistant Vice President of Human Resources for Hyatt. I have held this position since 2000. My duties include overseeing all of the labor and employee relations work. In my capacity, I am familiar with Hyatt's corporate structure and the employment of individuals in the National Sales Force, including Barbara Loder Hildebrandt.

2. In my capacity as Assistant Vice President for Human Resources, I have access to employee information, including information regarding employees employed in the National



Sales Force. This information includes personnel files, personnel information, dates of birth for Hyatt employees.

3. Generally, Hyatt employees are able to express interest in promotional opportunities during the evaluation process that occurs annually.

4. In my capacity as Assistant Vice President for Human Resources, I also am familiar with the reduction in force that took place in or about September and October 2001. I am aware that this reduction in force affected 10 sales personnel in the National Sales Force, as well as employees Company-wide.

5. The sales personnel in the National Sales Force who were affected and unaffected by the reduction in force in September-October 2001, broken down by office, genders, and dates of birth, are as follows:

Name	Office	Date of Birth	Gender
Bonnie Greenspan	Eastern	5/2/60	Female
John Hyland	Eastern	11/22/48	Male
Dan Jones	Eastern	7/15/59	Male
Andy Karpowicz	Eastern	4/27/65	Male
Ron Keith	Eastern	11/4/58	Male
Joe Koch	Eastern	4/7/64	Male
Faye Memoli	Eastern	6/20/71	Female
Carolyn Montrose	Eastern	5/5/64	Female
Rich Morrow	Eastern	6/12/64	Male
Mary Rocereto	Eastern	12/22/56	Female
Gary Schneeberg	Eastern	9/17/57	Male
 Dawn Beagle	 Western	 3/26/60	 Female
Trina Camacho-London	Western	3/25/65	Female
Jim Davis	Western	12/1/59	Male
Karen Gray	Western	8/29/53	Female
Julie Green	Western	7/14/60	Female
Kim Harrington	Western	10/13/60	Female

Jane Johnson	Western	7/18/55	Female
Jane Jordan	Western	2/9/63	Female
Karina Mirkin	Western	9/19/68	Female
Donna Palmer	Western	4/23/66	Female
Harumi Yoshiike	Western	1/13/44	Female
<b>Name</b>	<b>Office</b>	<b>Date of Birth</b>	<b>Gender</b>
Maria Andriola	Central	8/5/65	Female
Jan Bansfield	Central	9/4/59	Female
Donna Bongiovanni	Central	9/11/60	Female
Brian Booth	Central	5/16/62	Male
Carol Buseman	Central	11/28/51	Female
Denise Cmiel	Central	6/1/60	Female
Molly Crompton	Central	3/9/68	Female
Melissa Daniels	Central	3/11/66	Female
Barbara Hale	Central	4/27/67	Female
Mark Henry	Central	3/20/49	Male
<b>Barbara Loder</b>	Central	9/23/52	Female
<b>Mary Patton</b>	Central	6/21/64	Female
Fred Reichelt	Central	3/29/56	Male
Inge Spindola	Central	2/22/58	Female
Loretta Venezia	Central	8/1/59	Female
Michele Bondanelli	Northeastern	7/29/60	Female
Marilyn Braumbaugh	Northeastern	8/4/45	Female
<b>Dean D'Anna</b>	Northeastern	3/13/60	Male
Jim Van Devender	Northeastern	6/11/65	Male
<b>Wendy Jensen</b>	Northeastern	9/5/59	Female
Kathy Murphy	Northeastern	3/5/68	Female
Michelle Nicoletti	Northeastern	10/27/57	Female
Joanne Piano Rumsey	Northeastern	6/5/68	Female
Debbie Rodriguez	Northeastern	7/1/53	Female
Diane Smith	Northeastern	4/19/60	Female
Bonnie Weiss	Northeastern	4/5/50	Female
Michael Williamson	Northeastern	4/7/54	Male
Richard Wood	Northeastern	1/7/60	Male
Ellen Gerchick	Northeastern	5/31/51	Female
ADOS (Kelly Blice)	Omaha	11/18/67	Female
Amy Anderson	Omaha	3/7/71	Female
Shawn Anderson	Omaha	8/19/73	Male
Tara Bass	Omaha	2/12/71	Female

Nanette Bro	Omaha	9/22/58	Female
Sam Canova	Omaha	1/5/72	Male
Cory Carlson	Omaha	9/14/73	Male
Rose Castan	Omaha	3/30/58	Female
Cathi Draper	Omaha	9/4/63	Female
<b>Name</b>	<b>Office</b>	<b>Date of Birth</b>	<b>Gender</b>
Sally Farhart	Omaha	8/25/44	Female
Pat Garvey	Omaha	9/9/51	Female
<b>Cardella Gills</b>	Omaha	2/22/57	Female
Judy Lee Kirshman	Omaha	12/10/58	Female
Erin Moriarty	Omaha	4/21/77	Female
Tina Nebuloni	Omaha	9/3/59	Female
Linda Neubauer	Omaha	8/19/54	Female
Teresa O'Connor	Omaha	9/19/51	Female
Tim Peitzmeier	Omaha	6/1/66	Male
Jennifer Roman	Omaha	9/30/68	Female
<b>Herve Roussel</b>	Omaha	11/25/54	Male
Michelle Russell	Omaha	9/17/72	Female
<b>Gayle Smith</b>	Omaha	3/2/62	Female
Tonja Towne	Omaha	1/17/70	Female
Jennifer Uhlig	Omaha	3/31/73	Female
Gus Vonderheide	Omaha	10/17/61	Male
Jeanette Walter	Omaha	12/26/70	Female

The individuals in the above chart in bold type are the individuals who were affected by the Reduction in Force.

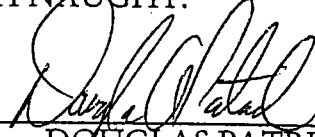
6. Company-wide, the number of employees affected by the reduction in force, broken down by age and gender, are as follows:

<u>Approximate total number of employees company-wide prior to the RIF:</u>	36,069 (100%)
Number of employees age 40 and over:	16,890 (47%)
Number of employees under 40 years of age:	19,179 (53%)
Number of female employees:	17,561 (49%)
Number of male employees:	18,508 (51%)

<u>Approximate number of employees affected by the reduction in force:</u>	522 (100%)
Number of employees age 40 and over:	130 (25%)
Number of employees under 40 years of age:	392 (75%)
Number of female employees:	294 (56%)
Number of male employees:	228 (44%)

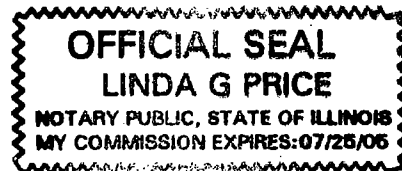
<u>Approximate number of employees company-wide as of December 31, 2001:</u>	35,547 (100%)
Number of employees age 40 and over:	16,760 (47%)
Number of employees under 40 years of age:	18,787 (53%)
Number of female employees:	17,267 (49%)
Number of male employees:	18,280 (51%)

FURTHER AFFLIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
DOUGLAS PATRICK

SWORN TO and SUBSCRIBED before me this 26<sup>th</sup> day of February, 2003  
by DOUGLAS PATRICK, Assistant Vice-President of Human Resources for HYATT  
CORPORATION, who is personally known to me or has produced  
\_\_\_\_\_ as identification.

  
\_\_\_\_\_  
NOTARY PUBLIC, STATE OF ILLINOIS



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WESTERN DIVISION

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vs.

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Defendants.

Case No. C-1-02-0003

Judge Beckwith  
Magistrate Judge Sherman

AFFIDAVIT OF BRUCE SMALL

STATE OF ILLINOIS }

COUNTY OF DUPAGE }

ss:

BEFORE ME, the undersigned authority, personally appeared, BRUCE SMALL, who, after first being duly sworn, deposes and states that he is an adult person, over 18 years of age, competent to testify as to the following matters as to which he has personal knowledge or which he believes to be true:

1. I have been employed with Hyatt since November 1984. I am currently the Director of Sales Information Systems for Hyatt. I have held this position since the fall of 2000. Prior to occupying this position, I served as the Director of Sales for the Central National Sales Office in Hyatt's National Sales Force from approximately 1995 until 2000.

2. In this position, my duties included overseeing the sales personnel in Hyatt's Central National Sales Office.

3. During my employment as the Director of Sales for the Central National Sales Office, in or about 1999, I made the decision to promote Mark Henry to serve as the Assistant Director of



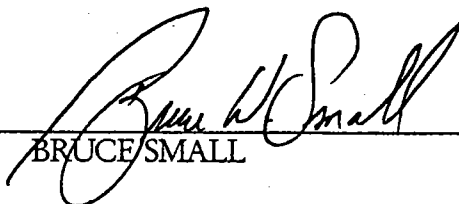
Sales for the Central National Sales Office, and my decision was approved by Christie Hicks, who was the Assistant Vice President of National Sales at the time.

4. The Assistant Director of Sales Position was located in Chicago, Illinois in Hyatt's Corporate Office.

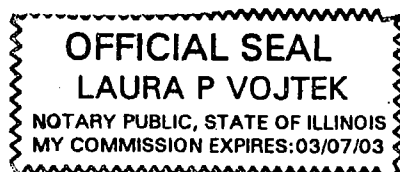
5. My decision to promote Mr. Henry was not based on his age or his gender, or the age or gender of any other individual.



FURTHER AFFLIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
BRUCE SMALL

SWORN TO and SUBSCRIBED before me this 25<sup>th</sup> day of February 2003, by  
BRUCE SMALL, who is personally known to me or has produced  
\_\_\_\_\_  
as identification.



Laura P. Vojtek  
Printed Name  
My Commission Expires: 3-7-03

*Laura P. Vojtek*